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August 7, 2019

Via ECF

The Honorable Ona T. Wang, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Vicente, et al. v. Ljubica Contractors LLC, et al.*
Case No. 18-cv-419(VSB)(OTW)

Dear Judge Wang:

We are counsel to Plaintiffs. Defendants were ordered to show cause by August 6, 2019 for their failure to pay Plaintiffs' counsel \$3,678.28 in sanctions per the Court's May 16, 2019 Order. *See* Dkt. # 51. Defendants' counsel has failed to make any such showing in direct violation of Your Honor's Order. *Id.*

Furthermore, Defendants' opposition to Plaintiffs' Motion for Summary Judgment was due July 29, 2019. Defendants have failed to file either their opposition or a letter motion for an extension of time to file their response.

For the foregoing reasons, we write to respectfully request that Your Honor recommend to Judge Broderick to consider Plaintiffs' pending Motion for Summary Judgment unopposed. We further respectfully renew our request for Defendants to pay a penalty of ten percent (10%), compounded daily, of the principal amount of \$3,678.26, for every day after July 1, 2019 until Defendants remit their payment in full. *See* Dkt. # 50.

We thank the Court for considering this matter.

Respectfully submitted,

/s/ C.K. Lee
C.K. Lee, Esq.

cc: all parties (via ECF)